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19 **UNITED STATES DISTRICT COURT**

20 **DISTRICT OF NEVADA**

21 Isaac Dwek, individually and on behalf of all
 22 others similarly situated,

23 Plaintiffs,

24 v.

25 Caesars Entertainment, Inc. and DOES 1
 26 through 10, inclusive,

27 Defendants.

28 Case No. 2:23-cv-01659-CDS-EJY

**STIPULATION AND ~~PROPOSED~~
 ORDER CONTINUING TIME FOR
 DEFENDANT CAESARS
 ENTERTAINMENT, INC. TO RESPOND
 TO COMPLAINT**

(FIRST REQUEST)

29 Defendant Caesars Entertainment, Inc. (“Caesars”) and Plaintiff Isaac Dwek (“Plaintiff”),
 30 by and through their undersigned counsel, hereby stipulate and agree as follows and jointly request
 31 that the Court enter an Order approving this Stipulation;

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33 ///

1 **WHEREAS**, on September 18, 2023, Plaintiffs filed their class action complaint in the
2 Eighth Judicial District Court, Clark County, Nevada, *Isaac Dwek v. Caesars Entertainment, Inc.*,
3 *et al.* No. A-23-877949-C;

4 **WHEREAS**, Caesars was served with the *Dwek* complaint on September 22, 2023;

5 **WHEREAS**, on October 12, 2023, Caesars removed the *Dwek* complaint to the United
6 States District Court for the District of Nevada;

7 **WHEREAS**, pursuant to Federal Rule of Civil Procedure 81(c)(2)(C), the deadline for
8 Caesars to answer or otherwise respond to the Complaint was October 19, 2023.

9 **WHEREAS**, seven additional actions arising from the same subject matter as the *Dwek*
10 complaint are currently pending in this District. The first five of these actions filed in this District
11 have been related, with the lead case being *Rodriguez v. Caesars Entertainment, Inc.*, No. 2:23-
12 cv-01447-ART-BNW (“Related Cases”);

13 **WHEREAS**, Plaintiffs in the Related Cases have filed an Unopposed Motion to
14 Consolidate the Related cases, which is currently pending before the Honorable Judge Anne R.
15 Traum;

16 **WHEREAS**, Caesars anticipates that the *Dwek* action will be related to and/or
17 consolidated with the Related Cases, and has filed a Notice of Related Cases in this action (ECF
18 No. 3);

19 **WHEREAS**, the parties in the Related Actions have agreed to stay Caesars’s deadline to
20 answer or otherwise respond to the complaints pending the filing of a Consolidated Complaint, or
21 a decision denying the Motion to Consolidate;

22 **WHEREAS**, to avoid unnecessary expenditure of resources and effort responding to the
23 complaint in this action where all parties are agreed that the Related Actions should be
24 consolidated, and while the Motion to Consolidate is currently pending, the Parties have agreed
25 to extend the time for Caesars to respond to the complaint in this action for forty-five (45) days,
26 until December 4, 2023.

27 ///

28 ///

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There is good cause to grant this request, which is not made for the purposes of delay. The Parties have not previously stipulated to any extensions of time to answer or otherwise respond to the Complaint.

It is therefore **STIPULATED** and **AGREED** that:

1. Defendant's deadline to file and serve any answer or other response to the Complaint is extended until December 4, 2023.

Dated: October 24, 2023.

KIND LAW

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IT IS SO ORDERED.

Elayna J. Zouckar
UNITED STATES MAGISTRATE JUDGE

DATED: October 24, 2023